

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Ex Parte Application of

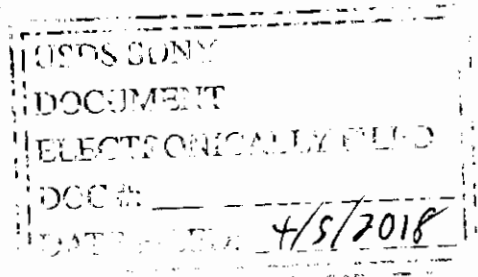
RICHARD RANDALL GREEN,

Applicant,

For an Order Pursuant to 28 U.S.C. §1782
Granting Leave to Obtain Discovery From
DEUTSCHE BANK TRUST COMPANY
AMERICAS and CITIBANK, NATIONAL
ASSOCIATION For Use In Foreign
Proceedings

Case No.

18 MC 71.



**~~PROPOSED~~ ORDER GRANTING EX PARTE APPLICATION
FOR JUDICIAL ASSISTANCE PURSUANT TO 28 U.S.C. §1782**

This matter having come before the Court upon the application (the "Application") of Richard Randall Green ("Applicant") for the entry of an order authorizing Applicant¹ to serve subpoenas for documents on Deutsche Bank Trust Company Americas ("Deutsche Bank Americas") and Citibank, National Association (formerly known as Citibank, N.A.) ("Citibank") (collectively, the "Discovery Entities"); and the Court having jurisdiction to consider the Application and the relief requested therein pursuant to 28 U.S.C. § 1782; and consideration of the Application, the accompanying memorandum of law, the France Declaration, the Roman Declaration (and exhibits thereto) having been made; and ~~no~~ notice of the Application ~~being~~ ^{having} ~~necessary or required~~ ^{been given to interested parties and affidavits having been filed;}; and after due deliberation thereon, and good and sufficient cause appearing therefore;


of service

¹ Any capitalized term used herein but not defined herein shall have the meaning set forth in the Application or the supporting memorandum of law filed contemporaneously herewith.

IT IS HEREBY ORDERED THAT:

1. The Application is granted.
2. Counsel for the Applicant is authorized to issue, sign and serve upon Deutsche Bank Americas a subpoena substantially in form and substance similar to the subpoena attached as Exhibit B to the Application.
3. Counsel for the Applicant is authorized to issue, sign and serve upon Citibank a subpoena in form and substance similar to the subpoena attached as Exhibit C to the Application.
4. The Discovery Entities are required to (i) serve responses and objections to their respective subpoenas by no later than the thirtieth (30th) calendar day following the entry of the Proposed Order, and (ii) produce all non-privileged documents responsive to the document requests for which no objection has been raised on a rolling basis beginning no later than the thirtieth (30th) calendar day following the entry of the Proposed Order, with such production to be completed no later than the seventy-fifth (75th) calendar day following the entry of the Proposed Order.
5. To the extent that the parties are unable to resolve any objection of the Discovery Entities consensually, the Court shall hear any such objection and set a deadline for the Discovery Entities to respond if such objection is overruled.
6. This Court shall retain jurisdiction with respect to the enforcement, amendment or modification of this Order.

Dated: 4/5, 2018


UNITED STATES DISTRICT JUDGE